

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Chapter 13
EUSTANCE O. UKU	:	
	:	Bankruptcy Number: 20-21650-CMB
	:	
Debtor	:	
	:	

**NOTICE OF ENTRY OF APPEARANCE  
AND REQUEST FOR NOTICES**

PLEASE TAKE NOTICE that PNC Bank, National Association (the “Creditor”), a creditor in interest in the above case, by and through its undersigned counsel, hereby enters its appearance pursuant to Section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 9010(b), and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007, and Sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned at the following address/telephone number/facsimile number/email address:

Kristen Wetzel Ladd, Esq.  
Unruh Turner Burke & Frees, P.C.  
17 W Gay Street  
PO Box 515  
West Chester, PA 19381  
Phone: 610.692.1371  
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Email: kladd@utbf.com

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above but also includes, without limitation, any notice, application, complaint,

demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, email, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE THAT neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive the Creditor's (i) right to have final orders in non-core matters entered only after a de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Creditor is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Respectfully submitted,

UNRUH TURNER BURKE & FREES, P.C.

Date: 6/11/2020

By: /s/ Kristen Wetzel Ladd  
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